Applicant: Healthonics, Inc.

MedRelief®® ST Series Microcurrent TENS Traditional 510(k) Premarket Notification



510(k) Summary:

510(k) Owner:

Healthonics, Inc.

903 Main Street South New Ellenton, SC 29803

Contact Person:

James W. Kronberg Chief Engineer Phone 803-652-235

Phone 803-652-2354 Fax 775-251-0023

Date Prepared: Device Name:

March 10, 2006 – Revised September 13, 2006

MedRelief ST ("Sub-Threshold") Series, consisting of models ST-100, ST-150, ST-200 and ST-300.

Common or Usual Name: Classification Name:

TENS device.

Transcutaneous Electrical Nerve Stimulator for Pain Relief. 21 CFR 882.5890, Class II, Product Code 84GZJ (prescription) or Stimulator, Electrical, Transcutaneous, for Arthritis. 21 CFR 882.5890, Class II, Product Code NYN (prescription).

Predicate Devices:

Healthonics MedRelief® SE-50 for acute and chronic

pain indications (K030998).

Bionicare **Model BIO-1000** for osteoarthritis (K030332) and rheumatoid arthritis (K983228) indications

Description of the Device:

The **MedRelief® ST Series™**, consisting of models **ST-100**, **ST-150**, **ST-200** and **ST-300**, is designed to provide subthreshold electrical stimulation for acute and chronic pain, including pain from osteoarthritis and rheumatoid arthritis, in a single compact, lightweight and user-friendly package. "Subthreshold" stimulation does not normally cause sensation or muscle contraction, but acts at a cellular level to relieve pain.

Each device in the ST Series is comprised of the following main components:

- A power section consisting of battery, switch, test and conditioning components;
- A dosing timer, initialized at power-on and providing a choice of treatment times;
- A control oscillator, providing pulse-burst timing;
- A pulse oscillator, providing timing for individual pulses; and
- An output section, providing filtering, DC blocking and intensity control.

While some components are digital, all functions are hard-wired and there is no microprocessor or software used. Output is by means of lead wires and skin-contact electrodes already commercially available and legally sold by others.

The member devices in the ST Series™ differ only in the complexity of their controls and number of physician or user options which each model offers.

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Indications and Intended Use:

- Relief of chronic intractable pain. (All models:):
- Adjunctive treatment of post-surgical or post-traumatic acute pain. (All-models) ?
- Adjunctive therapy in reducing the level of pain and symptoms associated with osteoarthritis of the knee. (ST-150, ST-200 and ST-300, cont.)
- Adjunctive therapy in reducing the level of pain, and stiffness associated with pain, from rheumatoid arthritis of the hand. (ST-150, ST-200 and ST-300 entry)

The indications are the same as for the predicate devices listed. All units are for prescription use only. The **ST-100** is a simplified unit meant for home use, with one output channel and a minimal set of signal options, closely similar to the **SE-50** predicate device. Other devices in the **ST Series™** are meant for a wider range of indications by including a signal modeled on that of the Bionicare **BIO-1000** predicate device. The **ST-150** is otherwise identical with the **ST-100**. The **ST-200** offers two output channels and more user options. The **ST-300** offers four channels, even more options, and is meant for use in a clinical setting only.

<u>Technological Characteristics</u>:

The technological characteristics of the **MedRelief® ST Series™** are the same as those of the predicate devices. Each device is battery-powered with no provisions for line power or AC adapters. Each uses solid-state electronics to produce trains of subthreshold electrical pulses, at frequencies within the human audible range (~20 Hz to ~20 KHz), which are applied to the body through self-adhesive or gelled electrodes placed on the skin. Pulses have zero net charge and may be applied either continuously, or divided into pulse bursts alternating with quiet periods. All signal characteristics comply with the safety requirements of AAMI NS4.

Comparison of Features of MedRelief® ST Series™ Models

(s) – user switch selected. (c) – user adjustable through continuous range.

Characteristic or Feature	ST-100	ST-150	ST-200	ST-300
Intended use	Intractable chronic, postsurgical / posttraumatic acute and arthritis-related pain			
Intended sale	Prescription only			
Number of output channels			2	4
Pulse frequency	700, 1800 or 4150 Hz (s)	100, 700 or 4150 Hz (s)	100, 230, 700,1800, 4150 Hz or 12 KHz (s)	100 Hz to 20 KHz (c)
Pulse (short phase) length	1/7 of long phase or 20 microseconds, whichever is greater			
Burst frequency	15 Hz in pulse burst mode; N/A in continuous mode.			
Burst duty cycle	15% or 100%* (s)		5% up to 100%* (c)	
Timer	None (runs whenever turned on)		30 min., 8 hrs or cont. (s)	
Dimensions, in.	2.5 x 2.1 x 0.63		3.5 x 2.5 x 1	7 x 5 x 2.5
		MedRelief miniatu	re 9V lithium	
Weight including battery	1.7 oz.		2.5 oz.	8 oz.
Charger, AC cord or adapter?	None			

^{*} Burst duty cycle of 100% = continuous operation.

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Comparison of General and Technical Characteristics to Predicates.

Electrical output measurements assume a 500-ohm load. Timing values cited below are accurate to $\pm 20\%$ or 10 microseconds, whichever is larger. Other cited values are accurate to $\pm 20\%$ unless otherwise stated.

For conciseness, (10), (15), (20) and (30) refer to the **ST-100**, **ST-150**, **ST-200** and **ST-300** respectively. "Same" plus one or more of these labels in a Predicate column means "same as in the indicated **ST Series™** device(s)," while without a label it means "same for all." See also notes 1-3 at the bottom of the table.

Unit Characteristic	Proposed Device	Predicate #1.	Predicate #2
Device name and model	MedRelief® ST Series	MedRelief® SE-50	BioniCare®
	(ST-100, ST-150, ST-200 and ST- 300)	(in SE Series).	Stimulator, Model BIO-1000™
Manufacturer	Healthonics, Inc.	Same.	BioniCare Medical
	903 Main Street South		Technologies,Inc.
	New Ellenton, SC 29803		47 R. Loveton Circle
		<u> </u>	Sparks, MD 21152
510(k) number	To be assigned	K030998	K030332, K983228
Procode	GZJ, NYN	GZJ	NYN
Intended Use	Chronic intractable pain.	Same as #1 and #2	Same as #3 and #4
(indications; abbreviated,	Post-surgical/post-traumatic acute	for proposed device.	for proposed device
see full list above.)	pain.		
	3. Pain/symptoms from osteoarthritis		
	of the knee.		
	Pain/stiffness from rheumatoid		
	arthritis of the hand.		
Number of output	One: subthreshold	Same.	Same.
modes	TENS.	odino.	Carrie.
Number of output	One (10, 15), two (20), or four (30).	One.	Version A: one.
channels.	(, ,,, = (==,, == (==,,	- Tona	Version B: two.
Pulse shape	Rectangular to exponential,	Same.	One phase
	depending on pulse length and		exponential, other
	charge balancing time chosen.		phase rectangular.
Mono- or biphasic	Biphasic	Biphasic	Biphasic (note 1)
Maximum instantaneous	8.62 mA	Same	24 mA
current			
Maximum time averaged	2.27 mA (2.71 mA, note 2)	Same	2 mA
current			
Maximum phase charge	12.4 μC at 100 Hz;	1.87 μC at 700 Hz	20 μC at 100 Hz
	1.87 μC at 700 Hz (note 2)	(note 2)	
Maximum current density	0.41 mA/sq.cm. (note 2)	Same	0.14 mA/sq.cm.
at electrode			(note 3)
Maximum power density	0.133 mW/sq.cm. (note 2)	Same	0.83 mW/sq.cm.
at electrode	B 14		(note 3)
Regulated current or regulated voltage?	Regulated current.	Same.	Regulated voltage.
regulated voltage? Software/ firmware/	No	<u></u>	
Soπware/ firmware/ /microprocessor control?	No	No	No in Version A; yes
Housing materials and	Flower retendent ADC at a Co	 	in Version B.
construction.	Flame-retardant ABS plastic.	Same.	Flame-retardant
Accessories:		L	Cycolac plastic
1. Electrodes.	Pregalled reusable alastrada	Described constitution	Divide 1
i. Licotioues.	Pregelled reusable electrode, 25 cm ² gel area, with "pigtail" wire	Pregelled reusable	BioniCare special
	connection. For 100 Hz use (15, 20,	electrode, 25 cm ² gel	design, metal mesh,
	30), same but with 175 cm ² gel area.	area, with "pigtail" wire connection.	170-176 cm ² gel-
2. Conductive	None	None	coated area. Spectra 360
	110110	LINOHE	Lopectra 360

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3. Electrode lead wires.	2 mm pin joined to 2mm socket by flexible wire	Same.	Semicustom wires, snap connectors
4. Batteries.	9V lithium batteries: miniature semicustom (10, 15, 20); standard rectangular (30).	Same (10, 15, 20)	Self-contained rechargeable battery.
 Battery charger, if used. 	None.	None.	Plug-in wall transformer type



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

OCT 1 3 2008

Healthonics, Inc. % Mr. James W. Kronberg Chief Engineer 903 Main Street South New Ellenton, South Carolina 29809

Re: K060669

Trade Name: MedRelief ST ("Sub-Threshold") Series consisting of model numbers ST-100.

ST-150, ST-200, and ST-300

Regulation Number: 21 CFR 882.5890

Regulation Name: Transcutaneous electrical nerve stimulator for pain relief

Regulatory Class: Class II Product Codes: GZJ, NYN Dated: September 13, 2006 Received: September 14, 2006

Dear Mr. Kronberg:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

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This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Mark N. Melkerson

Director

Division of General, Restorative and Neurological Devices Office of Device Evaluation Center for Devices and Radiological Health

Indications for Use

510(k) number (if known): ___K060669

Device Name: MedRelief ST ("Sub-Threshold") Series, consisting of model numbers ST-100, ST-150, ST-200 and ST-300.

Indications for Use.

For Prescription Use Model SE-100:

- Relief of chronic intractable pain.
- Adjunctive treatment of post-surgical or post-traumatic acute pain.

For Prescription Use Models ST-150, ST-200 and ST-300:

- Relief of chronic intractable pain.
- Adjunctive treatment of post-surgical or post-traumatic acute pain.
- Adjunctive therapy in reducing the level of pain associated with osteoarthritis of the knee.
- Adjunctive therapy in reducing the level of pain from rheumatoid arthritis of the hand.

Prescription Use(21 CFR 801 Subpart D)	AND/OR	Over-The-Counter Use (21 CFR 801 Subpart D)	
Concurrence of CDRH, Off	ice of Device Evaluation (ODE)	
•	Division Sign-Off		
3	Division of General, Restorative,		
	and Neurological I	Devices	
	510(k) Number	-060669	